

Hearing Date: July 10, 2012 at 10:00 a.m. (ET)

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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re:)	Case No. 12-12020 (MG)
)	
RESIDENTIAL CAPITAL, LLC, <u>et al.</u> ,)	Chapter 11
)	
Debtors.)	Jointly Administered
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**NOTICE OF FILING OF PROPOSED FINAL SUPPLEMENTAL ORDER UNDER
BANKRUPTCY CODE SECTIONS 105(a), 362, 363, 502, 1107(a), AND 1108 AND
BANKRUPTCY RULE 9019 (I) AUTHORIZING THE DEBTORS TO CONTINUE
IMPLEMENTING LOSS MITIGATION PROGRAMS; (II) APPROVING
PROCEDURES FOR COMPROMISE AND SETTLEMENT OF CERTAIN CLAIMS,
LITIGATIONS AND CAUSES OF ACTION; (III) GRANTING LIMITED STAY RELIEF
TO PERMIT FORECLOSURE AND EVICTION PROCEEDINGS, BORROWER
BANKRUPTCY CASES, AND TITLE DISPUTES TO PROCEED; AND
(IV) AUTHORIZING AND DIRECTING THE DEBTORS TO PAY SECURITIZATION
TRUSTEE FEES AND EXPENSES**

PLEASE TAKE NOTICE that Residential Capital, LLC (“ResCap”) files the attached
proposed Final Supplemental Order Under Bankruptcy Code Sections 105(a), 362, 363, 502,
1107(a), And 1108 And Bankruptcy Rule 9019 (I) Authorizing The Debtors To Continue
Implementing Loss Mitigation Programs; (II) Approving Procedures For Compromise And
Settlement Of Certain Claims, Litigations And Causes Of Action; (III) Granting Limited Stay

Relief To Permit Foreclosure And Eviction Proceedings, Borrower Bankruptcy Cases, And Title Disputes To Proceed; And (IV) Authorizing And Directing The Debtors To Pay Securitization Trustee Fees And Expenses (the “Proposed Order”)¹, attached hereto as Exhibit 1.

On June 15, 2012, the Court entered an order granting the relief requested in the Motion on an interim basis (the “Interim Order”). [Docket No. 391] An electronic comparison of the Proposed Order to the Interim Order is attached hereto as Exhibit 2.

The Proposed Order reflects an agreement reached among the Debtors, the National Association of Consumer Bankruptcy Attorneys, and the Committee regarding the scope of limited stay relief afforded to borrowers pursuant to paragraphs 12 and 13 thereof. The Debtors are continuing to work with the Committee and other parties in interest to resolve issues with respect to other provisions of the Proposed Order.

PLEASE TAKE FURTHER NOTICE that a hearing to consider the Proposed Order will take place on **July 10, 2012 at 10:00 a.m. (prevailing Eastern Time)** before the Honorable Martin Glenn, at the United States Bankruptcy Court for the Southern District of New York, Alexander Hamilton Custom House, One Bowling Green, New York, New York 10004-1408, Room 501.

PLEASE TAKE FURTHER NOTICE THAT a copy of the Motion and Proposed Order may be obtained via PACER at <http://www.nysb.uscourts.gov> or from the Debtors’ restructuring website at www.kccllc.net/rescap.

¹ On May 31, 2012, the Debtors filed the Debtors’ Motion for Supplemental Order Under Bankruptcy Code Sections 105(a), 362, 363, 502, 1107(a) and 1108 and Bankruptcy Rule 9019 (I) Authorizing the Debtors to Continue Implementing Loss Mitigation Programs; (II) Approving Procedures for Compromise and Settlement of Certain Claims, Litigations and Causes of Action; (III) Granting Limited Stay Relief to Permit Foreclosure and Eviction Proceedings, Borrower Bankruptcy Cases, and Title Disputes to Proceed; and (IV) Authorizing and Directing the Debtors to Pay Securitization Trustee Fees and Expenses [Docket No. 181] (the “Motion”). Capitalized terms used and not otherwise defined herein have the meanings ascribed to them in the Motion.

Dated: June 29, 2012
New York, New York

/s/ Darren M. Nashelsky

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